

REMARKS

In the June 29, 2005 Office Action, the declaration is indicated as being defective; claims 1 and 5 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 3,544,743 to Takei; claims 1-8 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 6,733,300 to Oguma; and claims 9 and 10 are indicated as being allowable.

The prior art rejections of claims 1-8 are respectfully traversed. In summary, neither Takei nor Oguma discloses, teaches, or suggests the first and second circuit boards of the claimed invention. Each rejection is addressed in detail below.

Declaration

The Office Action indicates that the declaration is defective for the misspelling of “Joseph E. Khoury.” However, the declaration as filed (attached as Appendix A) shows the correct spelling of “Joseph E. Khoury.” Therefore Applicants request that the objection to the declaration be withdrawn.

Claim Rejections – 35 U.S.C. 102

Claims 1 and 5 stand rejected under 35 U.S.C. 102(b) as allegedly being anticipated by U.S. Patent No. 3,544,743 to Takei. However, Takei fails to disclose, teach, or suggest all of the claim limitations of either independent claim 1 or 5. More specifically, Takei does not disclose, teach, or suggest a second circuit board, as recited in claims 1 and 5.

Instead, Takei teaches only one circuit board, that is circuit board 7, as seen in Figs. 2, 3a and 3b. Takei discloses a crossarm 1a of a steering wheel 1 that includes six switches 2-6 (e.g. for signal indicator, horn mechanism, etc.) secured to a circuit board 7 by rivets 10. As described in column 3, lines 20 – 29, when one of the switches is depressed, such as switch 5

for the horn, the horn mechanism circuit is completed between a ground lead 20 and a lead 14 on the circuit board 7 to actuate the horn. No other circuit board is disclosed or suggested by Takei. In fact, no other circuit board is needed to actuate the horn, for example, because the buttons/switches 2-6 are mounted directly to the circuit board 7, as seen in Fig. 2.

The Office Action interprets switch 5 as being a second circuit board. However, switch 5 is merely a switch for completing or disconnecting a circuit, that is between ground lead 20 and lead 14. A switch is not a circuit board. Claim language must be given their broadest *reasonable* interpretation. That means giving claim terms their ordinary and customary meaning. See MPEP section 2111.01. It is well known in the art that a circuit board is an insulated board on which interconnected circuits are mounted or etched. Switch 5 of Takei does not include a board with interconnected circuits.

Anticipation requires that every limitation of a claim must identically appear in a prior art reference. See *Gechter v. Davidson*, 43 U.S.P.Q. 2d 1030, 1032 (Fed. Cir. 1997). It is clear that the limitation of a second circuit board does not identically appear in Takei. Absence from the prior art reference of any claimed element negates anticipation. See *Rowe v. Dror*, 42 U.S.P.Q.2d 1550, 1553 (Fed. Cir. 1997).

Claims 1-8 stand rejected under 35 U.S.C. 102(b) as allegedly being anticipated by U.S. Patent No. 6,733,300 to Oguma. Oguma fails to disclose, teach, or suggest the first and second circuit boards of independent claims 1 and 5. Instead, Oguma discloses base members 18 and 19 which support a plurality of terminals. Neither base member 18 nor 19 meets the ordinary and customary meaning of a circuit board, that is a board that includes interconnected circuits.

Oguma discloses a rotary connector 30 that includes a stationary housing 1, a movable housing 2, a flexible cable 3 located between the housings 1 and 2, and first and second lead

blocks 16 and 17 connected to respective ends of cable 3. Lead block 17 includes first and second base members 18 and 19. The first base member 18 includes first terminal portions 18d extending from one side, and second terminal portions 18e extending through hole portion 18b, as seen in Fig. 5 of Oguma. The conductors of cable 3 connect to terminals 18e. The second base member 19 includes first terminals 19d and second terminals 19f and 19e. As seen in Fig. 4 of Oguma, terminals 19d are attached to terminals 18d of the first base member 18.

The terminals, 18d, 18e, 19d, 19e and 19f of the first and second base members 18 and 19, respectively, are merely pins or terminals and are not interconnected circuits. Base members 18 and 19 only provide support for the terminals are not circuit boards. Also, cable 3 is merely a cable with multiple conductors and not a circuit board. Therefore, it is clear that the limitations of first and second circuit boards do not identically appear in Oguma. Absence from the prior art reference of any claimed element negates anticipation. *Rowe*, 42 U.S.P.Q.2d at 1553.

Moreover, with respect to claim 1, terminals 19d and 18d are welded together. See col. 9, lines 56-61 of Oguma. Therefore, the base members 18 and 19 are not “non-fixedly” engaged, as recited in claim 1.

Accordingly, because all of the claim limitations are not found in either Takei or Oguma, Applicants request reconsideration and withdrawal of the claim rejections under 35 U.S.C. 102.

Dependent claims 2-4 and 6-8 are also allowable for the same reasons as discussed above. Moreover, these claims recite additional features not found in either Takei or Oguma. For example, claims 2 and 6 recite, among other elements, that the vertically extending arm is generally L-shaped, and that the resilient contact is located on a shelf; claims 3 and 7 recite, among other elements, that the resilient contact is a leaf spring; claim 4 recites that the

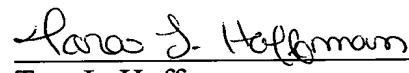
second circuit board is located in a base of a multi-function button assembly and the base having an opening so that the resilient contact of the first circuit board may engage the contact of the second circuit board; and claim 8 recites that the button assembly includes a housing with at least one cavity that holds at least one button which controls a vehicle function, and the button has a pin extending through the cavity for engaging the second circuit board.

Allowable Subject Matter

Applicants acknowledge and appreciate that indication of allowable subject matter with respect to claims 9 and 10

In view of the foregoing, Applicants believe claims 1-10 are in allowable condition. Prompt and favorable action is therefore respectfully solicited.

Respectfully submitted,



Tara L. Hoffman
Reg. No. 46,510

BLANK ROME LLP
600 New Hampshire Avenue
Washington, D.C. 20037
(202) 772-5800

Dated: September 29, 2005